Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Numbering Resource Optimization	)	CC Docket No. 99-200

QWEST CORPORATION SUPPORT/OPPOSITION TO PETITIONS FOR RECONSIDERATION/CLARIFICATION

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I. INTRODUCTION AND SUMMARY

Qwest Corporation ("Qwest")[1] comments herein on variously filed Petitions for Reconsideration and/or Clarification filed with the Federal Communications Commission ("FCC" or "Commission") in the above-referenced proceeding.[2] We obviously support proffered positions that are in accord with the advocacy already advanced by Qwest. Thus, we ***support*** those arguing for a relaxation of the highly circumscribed -- potentially punitive -- definition of "reserved numbers."[3] Even with

[1] On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. was renamed Qwest Corporation.

[2] Petitions for Reconsideration, Clarification and/or Declaratory Ruling in this proceeding were filed between July 10 and July 26, 2000.

[3] See AT&T Corp. ("AT&T") at 6-8; BellSouth Corporation ("BellSouth") at 5-11; SBC Communications Inc. ("SBC") at 2-4; Sprint Corporation ("Sprint") at 1-2; United States Telecom Association ("USTA") at 5-7, 12; Verizon Wireless ("Verizon") at 2-4; WorldCom, Inc. ("WorldCom") at 7. Reconsideration on this issue was sought by Qwest in its July 17, 2000 Petition for Reconsideration at 4-13, and was also addressed in U S WEST Communications, Inc. Comments filed May 19, 2000 at Appendix A at 2, n. 3 ("U S WEST Comments"). And see written Ex Parte of AT&T, NEXTLINK Communications ("NEXTLINK"), SBC, Sprint, Sprint PCS and Verizon, dated July 20, 2000, submitted by May Y. Chan, Verizon, to Ms. Magalie R. Salas, Secretary, FCC.

the recently-granted "extension" with respect to the effective date of this rule,[4] the public interest will not be served unless the rule is substantially modified or reconfigured. And we support those who argue that the current "utilization formula" inadequately and inaccurately reflects how numbering resources are actually used and what resources are actually available to carriers.[5] The proposed formula is infirm from a variety of perspectives. It suggests an inefficiency regarding numbering resources that is not founded in fact or fairness. That "assumed but inaccurate" suggestion, along with the deviation of the structure of the formula from actual carrier use, is bound to cause confusion that time cannot eliminate but only exacerbate. For these reasons, the formula should be changed.

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[4] On July 31, 2000, the Commission issued an Order extending the date by which its reserved number rule needs to be implemented until December 1, 2000. See In the Matter of Number Resource Optimization, CC Docket No. 99-200, Order, FCC 00-280, rel. July 31, 2000 at ¶ 2. Unless the Commission intends to have fully reconsidered the reserved number issue by this date -- a highly unlikely situation, given that the North American Numbering Council ("NANC") is not required to even formally submit to the Commission its "charging for reserved number proposal" until January of 2001, and the Commission has indicated that that input might well cause a change of position regarding the reserved number issue -- the change in the effective date really does not do much more than provide additional time for carriers to advise their large business, educational and governmental customers of the havoc about to be insinuated in their telecommunications services management. Then, theoretically anyway, after informing them of this, sometime in 2001, the Commission might "remove" the havoc by devising a charging plan that -- but for the monetary outlay -- essentially puts these customers back to a *status quo* position.

Moreover, as discussed more fully below, after December 1, 2000, the Commission's numbering rules will so seriously skew the competitive marketplace by treating facilities-based carriers and resellers differently with respect to numbering resources, that artificial competitive movement will be likely. Stated differently, the Commission's current rules are not competitively neutral.

[5] See, e.g., AT&T at 4-6; BellSouth at 11-15; SBC at 7-9; USTA at 13-14; Verizon at 2-3, 5-6. And see U S WEST Comments at Appendix A at 3-4.

In addition to supporting those who raise arguments similar to those already raised by Qwest, we support AT&T's position that all resellers, whether or not they have an Operating Company Number ("OCN"), should be required to be full participants in the Commission's number optimization regime. A failure to adopt this position results in the absence of competitive neutrality with respect to the structure of the regime itself.[6]

Qwest supports the SBC position that full cost recovery for number pooling is essential, at both the state and federal levels.[7] And, we support the position of WorldCom and Sprint that the "basic model" associated with number pooling should be as national and uniform as possible. This should preclude permitting states to require additional data collection or reports above and beyond those already required[8] by the Commission in its NRO Order.[9]

Qwest ***opposes*** those filings which seek to insinuate matters into this number pooling proceeding which are more legitimately associated with local number portability ("LNP") obligations/structures. Such commentors include WorldCom (pressing for mandated Unassigned Number Porting ("UNP") trials),[10]

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[6] Compare BellSouth's position, which appears based on the assumption that all resellers (given their status as "carriers") are already required to report and comply with the FCC's number resource management obligations. See notes 15 and 18, below.

[7] See SBC at 6-7.

[8] See WorldCom at 7; Sprint at 19-20.

[9] In the Matter of Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 7574 (2000) ("NRO Order" or "Further Notice").

[10] See WorldCom at 10.

the California Public Utilities Commission and the People of the State of California ("California PUC") (seeking to extend LNP obligations to carriers operating in the state),[11] and The National Emergency Number Association and The National Association of State Nine One One Administrators ("NENA/NASNA") (arguing that LNP has caused problems for 911 operations).[12] Certainly no UNP mandate should be issued before the Commission receives its requested report from the NANC providing further information around UNP. Furthermore, as carriers struggle to implement the mandates associated with the Commission's NRO Order, the Commission should not require that limited carrier resources be bifurcated between number porting and number pooling implementation tasks.

Qwest also opposes the Maine Public Utilities Commission ("Maine PUC") advocacy around the current Industry Numbering Committee ("INC") process(es) and the value of its outputs.[13] The current situation is clearly a "good" situation that should not be sacrificed to some ideal notion of the "perfect."

Finally, Qwest opposes the Maine PUC proposal that carriers include all numbers, including those secured during the past 90-day period, in their reported numbers associated with the utilization formula. The numbers excluded from the utilization formula are included in the months-to-exhaust calculations -- the more

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[11] See California PUC at 14-15.

[12] See NENA/NASNA at 1-2. This is not to say that the issues raised by NENA/NASNA are not serious ones requiring attention, but rather that those issues are being raised in the wrong forum for resolution, i.e., if the problem began with LNP, that "root cause" situation needs to be the starting place of the investigation.

[13] See Maine PUC at 2, 7-9.

material place for them to be included. Including them in the utilization formula would provide an even more inaccurate view of actual utilization than the formula as currently proposed.

II. MATTERS SUPPORTED BY QWEST

A. Resellers Should Fully Participate In Number Management

AT&T and BellSouth makes a persuasive case that all resellers -- regardless of whether they have an OCN[14] -- should be required to fully participate in the Commission's number optimization regime.[15] Resellers are carriers in their own right, with regulatory obligations concomitant with that role generally imposed similarly to facilities-based carriers. As AT&T points out, resellers are not generally in an agency or partnership relationship with the facilities-based carrier but in competition with them.[16] A failure to impose number optimization obligations on such carriers results in a lack of competitive neutrality from two perspectives.

First, the administrative "burdens" associated with number optimization and management should not fall solely on the shoulders of facilities-based carriers or on those resellers with OCNs. They should not be the only entities required to fund and create a numbering optimization resource infrastructure; nor should they be

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[14] As AT&T points out, some carriers such as switchless resellers might not have an OCN. However, they indisputably remain "carriers." See AT&T at 3.

[15] See AT&T at 4. Compare BellSouth at 1 (not addressing the OCN matter but stating that "all carriers that receive numbering resources [are required] to report forecast and utilization data" to the North American Numbering Plan Administrator ("NANPA")), 4-5.

[16] See AT&T at 3.

the only ones to categorize numbers into "silos" or submit "months-to-exhaust" documents with the Pooling Administrator ("PA"). Establishing a numbering administration wherein one type of carrier -- a "non-OCN reseller" can simply sit on a category of numbers called "intermediate numbers"[17] (until they assign them out) would essentially give those reselling competitors a free ride regarding number conservation and management *vis-à-vis* their competitors.[18]

Second, allowing resellers to avoid the costs, management burdens and obligations of "reserved" numbers -- which they will do if the only options associated with "intermediate numbers" are "intermediate" or "assigned" status -- is certainly not competitively neutral. The reselling carrier can hold numbers in its inventory forever until a customer wants one, creating an unwarranted loophole in both compliance and market presentation. While the facilities-based carrier is incurring the wrath of the large education or governmental customer, the reseller will be currying its favor. Why should a reseller be the only carrier entity able to satisfy

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[17] WorldCom points out language in the FCC's NRO Order that could be read to hold that numbers assigned to carriers with an "intermediate" moniker never convert again to "assigned" when that reseller assigns them. See WorldCom at 6 (the confusion deriving from the fact that the FCC only mentions non-carrier entities when it talks about shifting from "intermediate" to "assigned" status). This makes no sense to Qwest, but it is what the NRO Order says. But compare AT&T at 2-3 ("intermediate numbers are not deemed 'assigned' until they are **assigned by a reseller** or other entity to a specific end user." Emphasis added). We ask that the Commission clarify its intention regarding this item. At a minimum, one would expect the number to change status once assigned, regardless of the status of the entity holding the intermediate number.

[18] BellSouth, acting on the assumption that all carriers must report data utilizing the five silo reporting structure, asks for reconsideration regarding a facilities-based carrier's obligation to report number assignments (from intermediate numbers)

customers who need long lead times in terms of numbering resources?

WorldCom argues that only the owner of the switch where the numbers are resident should have all reporting obligations and that carriers holding such numbers should have none.[19] However, it presents no compelling evidence or argument as to why such should be the case.[20]

The more rationale and defensible regulatory position is that all carriers share in the gain and the pain of number resource optimization and management -- including resale carriers. While some numbers might be in the category "intermediate" for the facilities-based carrier, the resale carrier should have a reporting obligation in its own right where those numbers themselves are then categorized according to the Commission's definitional model. This should be the case regardless of the fact that such carriers might lack an OCN.

B. Cost Recovery Of Federally Assigned Items

Qwest supports SBC's position that carriers are entitled to full cost recovery regarding the design, development and deployment of thousand-block number pooling. Specifically, we support the position that costs directly related to the NPAC 3.0 and Efficient Data Representation ("EDR") clearly are costs associated with federal number pooling initiatives and mandates. Therefore, all costs

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when the assignment is done by a non-carrier entity only. See BellSouth at 2-3. Accord Personal Communications Industry Association ("PCIA") at 10-12.

[19] See WorldCom at 6-7 (addressing "intermediate numbers").

[20] WorldCom's argument around the fact that the recipient of the numbers might be confusing, as to its status as a carrier, does not really pertain to whether if the recipient is a carrier, it should have a reporting obligation.

associated with them should be recovered through the federal cost recovery mechanism.[21] As SBC states, "Neither of [the] two innovations [identified above] would have been deployed and implemented but for national number pooling. . . . Therefore, the costs directly attributable to these modifications should be properly recoverable under the federal cost recovery mechanism."[22]

C. States Should Not Be Permitted To Require Routine Additional Data Collection Or Reports

WorldCom and Sprint persuasively argue that states should not be able, as a matter of routine state numbering activity, to require additional number administration initiatives, data collections or reports, over and above those required by the FCC in its NRO Order.[23] As WorldCom argues, while states might be able to require *ad hoc* data collections, they should *only* be permitted to seek the collection "for the categories of number use that the Commission has adopted."[24] Sprint is correct in its argument that the benefits (and the costs) associated with the FCC's data collection and reporting regime would be entirely upended "if each state were free to develop its own number categories and to impose its own data collection requirements."[25]

Most especially as carriers attempt to get up and running regarding the

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[21] See SBC at 6-7.

[22] Id. at 7.

[23] See WorldCom at 8; Sprint at 19-21.

[24] WorldCom at 8.

[25] Sprint at 19, referencing similar conclusion expressed in NRO Order, 15 FCC Rcd. at 7606-07 ¶ 76.

mandates of the NRO Order and the NANPA data collection and reporting requirements, the ability of states to add reporting requirements should be circumscribed. States should be required to seek "additional reporting authority" from the FCC, which should be only sparingly granted, rather than have such authority ceded to them *en masse*. The individual attention associated with such requests should provide the Commission with the opportunity to assess, on a case-by-case basis, the need for the report as well as the cost/benefit analysis of allowing it. Finally, the FCC should assure that cost recovery associated with the creation of any additional reports is ensured to the affected carriers.

III. MATTERS OPPOSED BY QWEST

A. No UNP Trials Should Be Mandated

WorldCom argues that an association that it has developed with Focal Communications ("Focal") has somehow "demonstrated that existing systems are sufficient to support *certain* UNP applications."[26] Based on this "evidence," WorldCom asks the FCC to reconsider its UNP position and to mandate a UNP trial.[27]

Once again, the FCC should reject the insinuation of UNP matters into number pooling initiatives. This is especially true given that a "progress report" on

[26] WorldCom at 10 (emphasis added), referencing an *Ex Parte* letter filed with the Commission in March of 2000, but not incorporated by reference into the instant WorldCom filing.

[27] WorldCom's reference to its trial with Focal neglects to mention that the systems utilized in the trial are small, localized, and limited in scope when compared to the magnitude of the complex and centralized systems used by large carriers elsewhere in the industry.

UNP matters (including feasibility and costs) is to be filed with the Commission, pursuant to its request, in January of next year.[28] Contrary to WorldCom's rhetoric that UNP is just a minor adjustment along the road to thousand-block number pooling deployment nationwide, the Commission correctly determined that UNP is not sufficiently developed for adoption and recognizes the potential impact of UNP on companies' switching systems and OSS mapping logic. Further, the Commission is justified to remain concerned with a carrier's ability to control its own number inventories and forecast numbering needs.[29]

Moreover, UNP is a *number porting, **not** a number pooling*, initiative. To introduce a further number porting regulatory mandate in the midst of regulatory mandates associated with number pooling initiatives strains the resources of the carriers at a time when those resources should be focused. For all of the above reasons, the WorldCom request should be denied.

B. No Change In The INC Process Is Necessary

The Maine PUC takes issue with the role the INC plays in numbering and number administration matters. It notes that the Commission has directed the industry (and the ultimately chosen PA) to follow the INC Thousand Block Pool Administration Guidelines ("INC Guidelines").[30] And, it notes the further linkage

[28] The industry groups currently considering this issue have not even agreed to a basic definition of UNP, let alone a process as to how it would work. See INC 51 LNPA Workshop Meeting Minutes dated July 26, 2000.

[29] See In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, Order, DA 00-1616, rel. July 20, 2000 at ¶¶ 55-56; NRO Order, 15 FCC Rcd. at 7677 ¶ 230.

[30] See Maine PUC at 7-10.

between those Guidelines and the NANPA as found in 47 C.F.R. Section 52.13.

But after making these factual observations, the Maine PUC goes on to state that "the collective effect of these provisions is to give industry-drafted guidelines, which can be changed at any time by the industry, the force of law *without any provision for regulatory review of those guidelines or any changes made to them*."[31] The Maine PUC's characterization is not accurate.

First of all, the INC process is an open process in which the NANPA actively participates and regulatory participation is welcomed and encouraged. The fact that some voices (e.g., individual members of the public or state regulatory personnel) choose not to participate does not render the process a closed one. Nor does it mean the "dominant voice" is a bad voice, the wrong voice or a sinister voice -- it is simply the dominant (through interest and default) voice.[32]

As numbering decisions are made at the INC through the vehicles of participant contributions and consensus decision making,[33] there might be a "moment in time" where NANPA might be bound by a decision it does not agree with or that it questions from a technical or policy perspective. However, the INC is then free to seek federal regulatory advice of counsel -- and it does so. Altogether,

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[31] Id. at 7 (emphasis added).

[32] The dominance of industry in the INC is hardly surprising given its linkages to Alliance for Telecommunications Industry Solutions ("ATIS") and its relationship to standards setting committees. Such technically-based bodies are usually dominated by industry participants who are educated in the ways of the business, as well as current and future technological capabilities and innovations.

[33] The Maine PUC argues that the process is slow. See Maine PUC at 9. That is not uncommon for consensus-driven bodies, yet such bodies generally deem the value of consensus to be a greater good than the swiftness of the deliberation.

then, the process more than amply provides "for regulatory review" of the INC Guidelines and changes.

What the Maine PUC really objects to is that it has budget and staffing constraints -- constraints generally imposed on state agencies by state legislatures making decisions about the appropriate allocation of state resources -- that restrict its ability to participate in the guideline-producing process.[34] For this reason, it wants that process to be converted to one that is "advisory only," until some future point in time when some newly-constituted federal-state regulatory review board has an opportunity to sign off on the Guidelines.

This is both unnecessary and inappropriate under the Telecommunications Act of 1996 (the "Act"). The Act lodges numbering policy in the Commission unless delegated. In fact, the oversight of the INC Guidelines that the Maine PUC seeks already exists as part of the charter for the NANC -- the FCC's delegated numbering advisory body that is made-up of a cross-section of representatives of industry subject matter experts, state regulatory bodies and consumer advocates.

Fundamental numbering decisions need to be controlled through a national process, but one that is open to all speakers and all voices.[35] That process currently exists in the INC. The fact that the Maine PUC cannot, or has chosen not to,

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[34] See Maine PUC at 9.

[35] Conference bridging is available upon advance notice to ATIS, but in the past the use of this method has been discouraged. It is extremely difficult to present and discuss issues and contributions, and maintain parliamentary procedures, when some participants cannot see or be seen by other participants. It has been useful, however, on occasions when conference participation has been limited to a critical participant on a particular issue.

participate in that process does not warrant **re-**creating another layer of regulatory authority in the wake of a statute whose chief and primary objective was to *deregulate* the processes of utility governance. In that regard, the INC process could be considered a model of moving from top-down government control to government oversight with ample opportunities for intervention.

C. Newly Acquired Numbers Should Not Be Included In The Utilization Formula

The Maine PUC claims that carriers should be required to include recently acquired resources their utilization rate calculation because "to do otherwise encourages carriers to develop a scheme to circumvent the utilization requirements."[36] However, Maine PUC stops short in its analysis by not fully comparing these statements against the newly adopted reclamation processes and months-to-exhaust Worksheet.

As the Maine PUC recognizes, and the Commission clarifies,[37] carriers **are** required to include their entire inventory, which includes "newly acquired numbers," in their months-to-exhaust worksheet analysis. This is the appropriate place to account for these resources. Should the utilization equation be changed to include "newly acquired resources," the result would be a further depression of the yet-to-be-determined utilization threshold to no immediately quantifiable end other than further administrative burden. The fact that these recently acquired

[36] Maine PUC at 10-11.

[37] See Public Notice, Common Carrier Bureau Responses to Questions in the Numbering Resource Optimization Proceeding, DA 00-1549, CC Docket No. 99-200, rel. July 11, 2000 at 4.

resources are excluded from the calculation for the first 90 days does not mean that they will not eventually be counted. Rather, they will not be reported until the utilization of these resources reaches levels that justify doing so.

Moreover, if carriers were required to include "un-mature" codes, i.e., those less than 90 days old, in the utilization formula (as the Maine PUC argues), the carrier's utilization would appear lower than what it actually is (even assuming use of the FCC's currently proposed formula), rendering it difficult to secure additional numbering resources when needed. This would be true particularly where there are seasonal demand shifts of some significance, such as during holiday seasons. For these reasons, the FCC is correct in not including these numbers in the utilization formula as currently proposed.

IV. CONCLUSION

For all the above reasons, the Commission should grant the relief which is supported by Qwest and reject that which is opposed. Both are grounded in sound law, logic and policy. The positions outlined herein, if adopted, would aid in

producing a more rationale, commercially-reasonable number administration and optimization methodology and policy.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Kristi Jones, do hereby certify that I have caused 1) the foregoing **QWEST CORPORATION SUPPORT/OPPOSITION FOR PETITIONS FOR RECONSIDERATION/CLARIFICATION** to be filed electronically with the FCC by using its Electronic Comment Filing System, 2) a copy of the **SUPPORT/OPPOSITION FOR PETITIONS FOR RECONSIDERATION/ CLARIFICATION** to be served, via hand delivery, upon the persons/entity listed on the attached service list (marked with an asterisk) and 3) a courtesy copy of the **SUPPORT/OPPOSITION FOR PETITIONS FOR RECONSIDERATION/CLARIFICATION** to be served, via first class United States mail, postage prepaid, upon the persons listed on the attached service list.

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August 15, 2000

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